

Message

From: Wang, Gary [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E0F45B81B7A448C285545E9D3487871E-WANG, LIANG-JANG (GARY)]
Sent: 4/9/2021 3:55:18 PM
To: Yalung, Michelle [Michelle.Yalung@meritenergy.com]
Subject: RE: Merit Energy Wind River Annual Injection Reports - 2020

Hi Michelle,

Another good question! You have a valid point regarding the average injection flowrate. I think the heart of the issue goes to how you define average injection flowrate.

- One way of looking at average flow rate is as you have described, by looking at the monthly volume divided by the number of days. The limitation for this definition is that it's an overall average, and may include periods when a well may not be injecting, and doesn't necessarily represent the average flowrates during the well's active period.
- The other way of looking at average flowrate is to looking at the flowrates during the active injection of the well. This average flow rates would provide a better picture of the operation of the well such as how flowrates may potentially impact the wellhead pressures.

I'm looking towards the second definition, since it would be a more valuable number in looking at well operation. Let me know if this makes sense for you and if that figure is available on your end. I'm open to have further conversations with you on this if you'd like.

Gary Wang
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1595 Wynkoop St.
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Mailcode: 8ENF-W-SD
PH: 303-312-6469
EMAIL: wang.gary@epa.gov

From: Yalung, Michelle <Michelle.Yalung@meritenergy.com>
Sent: Friday, April 9, 2021 7:47 AM
To: Wang, Gary <wang.gary@epa.gov>
Subject: RE: Merit Energy Wind River Annual Injection Reports - 2020

Good morning Gary,

In column "P" where you ask for average injection flowrate, wouldn't that just be the monthly injection volume divided by the number of days? So, monthly cumulative/ # of days in month = average injection flowrate.

Best regards,

Michelle Yalung

Regulatory Analyst | South Rockies | Merit Energy Company
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MERIT ENERGY

From: Wang, Gary <wang.gary@epa.gov>
Sent: Thursday, April 1, 2021 4:27 PM
To: Yalung, Michelle <Michelle.Yalung@meritenergy.com>
Cc: Wiser, Nathan <Wiser.Nathan@epa.gov>; Breffle, Don <Breffle.Don@epa.gov>; Cantor, Tiffany <Cantor.Tiffany@epa.gov>
Subject: RE: Merit Energy Wind River Annual Injection Reports - 2020

Hi Michelle,

I'm following up with you regarding my review of Merit's annual monitoring requirements. Find attached the monitoring requirements for the injection wells on Circle Ridge & Steamboat Butte. The spreadsheet outlines all the different requirements for each well, and notes which informations have been submitted. I do want to note that this was just a review of the monitoring report requirements and is not a comprehensive review of all the permit conditions. There may be additional conditions in each of the individual well permits that we did not review. Please review the attachment and let me know if you have any questions.

A few notes on the Spreadsheet:

- The boxes marked in yellow indicate that the measure is required for the well.
- There are additional specific requirements specific to the gas injectors (Shoshone 65-3 & Shoshone 63-2), highlighted in Column V of the spreadsheet.
- In the "Sheet2" tab of the spreadsheet, I've provided the permit language for all the various permit versions reviewed.

Overall, this means that Merit stills has some compliance gaps, and additional monitoring value will need to be submitted to EPA. Please feel free to reach out to me if you have any questions regarding this email. I am happy to have a call and walk through any questions on the spreadsheet. Thanks.

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From: Wang, Gary
Sent: Friday, March 12, 2021 2:27 PM
To: Yalung, Michelle <Michelle.Yalung@meritenergy.com>
Cc: Minter, Douglas <Minter.Douglas@epa.gov>; Wiser, Nathan <Wiser.Nathan@epa.gov>
Subject: RE: Merit Energy Wind River Annual Injection Reports - 2020

Hi Michelle,

Hope you are well. I just wanted to provide a heads up email regarding the 2020 AMR submittals. I've been systematically reviewing each of the individual Merit injection well permits and there are additional requirements for various wells that will need to be submitted for the 2020 AMR. I'm currently trying to compile each of the specific well

requirements and will reach back to you once I can get the information organized, which I'm hoping will be sometime next week. We can have a discussion on each of the individual well requirement then.

Let me know if you have any questions on this email.

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From: Yalung, Michelle <Michelle.Yalung@meritenergy.com>
Sent: Thursday, February 25, 2021 1:31 PM
To: Wang, Gary <wang.gary@epa.gov>
Subject: FW: Merit Energy Wind River Annual Injection Reports - 2020

Gary – I appreciate your patience on these. Sadly, myself and IT could not find an easy resolution for the PDF duplication glitch. Attached please find revised 2020 annual injection reports and water analysis results. If there is anything I missed, please let me know.

Have a good weekend!

Best regards,

Michelle Yalung

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MERIT ENERGY

From: Yalung, Michelle
Sent: Friday, February 12, 2021 4:21 PM
To: Gary Wang - EPA Region 8 (wang.gary@epa.gov) <wang.gary@epa.gov>
Subject: Merit Energy Wind River Annual Injection Reports - 2020

Good afternoon Gary,

Attached please find a digital copy of the 2020 annual injection reports for Merit's Wind River wells. I apologize for the inconvenience, currently we are waiting for our water samples to come back from the lab. As soon as I get the reports back, I will send them your way.

Also – I placed the hardcopies in the FedEx box, so you should have them by Monday.

Hope you're staying safe and healthy!

Best regards,

Michelle Yalung

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